

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>REMOVE YOUR CONTENT, LLC,</b>  <b>Plaintiff,</b>  <b>v.</b>  <b>MARK BOCHRA,</b>  <b>Defendant</b>	δ δ δ δ δ δ δ δ	<b>CIVIL ACTION NO. 3:09-cv-393</b>
---	--------------------------------------	-------------------------------------

**PLAINTIFF'S WITNESS LIST**

TO THE HONORABLE DISTRICT COURT:

NOW COMES the Plaintiff, Remove Your Content, LLC by and through its attorneys and, pursuant to the Federal Rules of Civil Procedure and this Court's Scheduling Order, files this Witness List:

Witness	Sworn	Testified
<b>Eric Green, President of Remove Your Content, LLC</b> Mr. Green is expected to testify regarding the email messages he received, the blogs in question, and the resulting damages to his business. Mr. Green is also expected to testify as an expert regarding general computer and internet issues, such as blog postings, IP addresses, and similar issues. Mr. Green has not been deposed. It is anticipated that Mr. Green's direct examination will take approximately 3-4 hours.		
<b>Defendant, Mark Bochra</b> It is expected that Mr. Bochra will testify regarding his version of the facts. Mr. Bochra has not been deposed. It is anticipated that Mr. Bochra's cross examination will take approximately 1-2 hours, although this may vary depending on his testimony.		
<b>Ms. Alondra Dimas Aguillon</b> Chicago, IL It is expected that Ms. Dimas will testify via deposition on written questions/affidavit. Ms. Dimas Aguillon has not been deposed orally.		
<b>Custodian of Records of Google, Inc., AT&amp;T, and the</b>		

<b>University of Illinois at Chicago</b> It is expected that the business records affidavit/subpoena responses will be submitted at trial. No oral depositions of these individuals have been taken.		
<b>Jay R. Stucki</b> It is expected that Mr. Stucki will testify regarding attorney's fees and costs only, if necessary.		

Respectfully submitted,

**Hulse ♦ Stucki, PLLC**

/s/ Ellen Cook Sacco

**Jay R. Stucki**

Texas Bar No. 00798531

[JStucki@AttorneysForBusiness.com](mailto:JStucki@AttorneysForBusiness.com)

**Ellen Cook Sacco**

Texas Bar No. 24029491

[ESacco@AttorneysForBusiness.com](mailto:ESacco@AttorneysForBusiness.com)

2912 West Story Road

Irving, Texas 75038

Tel. (214) 441-3000

Fax. (214) 441-3001

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of this document was served on June 21, 2010, via certified mail, return receipt requested upon Defendant pro se.

/s/ Ellen Cook Sacco  
Ellen Cook Sacco